

IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

GREGORY T. ANGELO, ET AL.,

Plaintiffs-Appellants,

v.

DISTRICT OF COLUMBIA, ET AL.,

Defendants-Appellees,

**CONSENT MOTION OF THE
PLAINTIFFS-APPELLANTS FOR A THIRTY-ONE-DAY
EXTENSION OF TIME TO FILE THEIR REPLY BRIEF**

On Appeal from the United States District Court
for the District of Columbia (No. 1:22-cv-01878-RDM)

The Reply Brief of Plaintiffs-Appellants (Gregory T. Angelo, Tyler Yzaguirre, Robert Michael Miller, and Cameron M. Erickson) is currently due on June 13, 2025. The Plaintiffs-Appellants respectfully request a 31-day extension of time, until Monday, July 14, 2025, within which to file their Reply Brief.

All the Defendants-Appellees consent to this relief.

There is good cause for the requested relief. One of the undersigned is the lead lawyer in *Thompson v. Keliher*, No. 25-1007 (1st Cir.), and has been working to complete appellate briefing in that case, which involves complex Fourth

Amendment/GPS Tracking issues on fishing boats. He also represents the plaintiffs in *Soffer v. George Washington University*, No. 1:25-cv-1657 (D.D.C.), a sprawling Title VI case, and *StandWithUs Center for Legal Justice v. CodePink*, No. 2:24-cv-5704 (C.D. Cal.), a putative FACE Act class-action. He is also laboring under the loss of several associate attorneys who would have otherwise been available to assist with preparation of the Reply Brief.

The other undersigned counsel has a reply brief in a novel Second Amendment case due on June 12, 2025, and is sole counsel on a number of ongoing matters before the District Court, the D.C. Superior Court and the D.C. Office of Administrative Hearings.

Given the press of these cases, additional time is necessary for the completion of the Plaintiffs-Appellants' Reply Brief.

Accordingly, this Court should grant the Plaintiffs-Appellants' request for a 31-day extension of time, until July 14, 2025, to submit their Reply Brief.

Dated: June 2, 2025

Respectfully submitted,

/s/ George L. Lyon, Jr.

George L. Lyon

BERGSTROM ATTORNEYS

1929 Biltmore Street, NW

Washington, DC 20009

(202) 669-0442 (phone)

(202) 483-9267 (facsimile)

gll@bergstromattorneys.com

/s/ Edward M. Wenger

Edward M. Wenger

HOLTZMAN VOGEL BARAN

TORCHINSKY & JOSEFIK PLLC

2300 N Street NW, Suite 643A

Washington, DC 20037

(202) 737-8808 (phone)

(540) 341-8809 (facsimile)

emwenger@holtzmanvogel.com

Counsel for Plaintiffs-Appellants

CERTIFICATE OF COMPLIANCE

1. This document complies with the type-volume and word-count limits of Federal Rule of Appellate Procedure 27(d) because, excluding the parts of the document exempted by Federal Rule of Appellate Procedure 32(f), this document contains 243 words.

2. This document complies with the typeface and type-style requirements of Federal Rule of Appellate Procedure 27(d) because this document has been prepared in a proportionally spaced typeface using Microsoft Word in 14-point Times New Roman font.

/s/ Edward M. Wenger
EDWARD M. WENGER

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 2nd day of June, 2025, a true copy of the Joint Consent Motion of the Plaintiffs-Appellees for a Thirty-One Day Extension of Time to File Their Reply Brief was filed electronically with the Clerk of Court using the Court's CM/ECF system, which will send by email a notice of docketing activity to the registered Attorney Filer on the attached electronic service list.

/s/ Edward M. Wenger
EDWARD M. WENGER